

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In Re:

*

*

DEEP MARINE HOLDINGS, INC., * Case No. 09-39313

et al *

*

Jointly Administered
Debtors. * Chapter 11

**NOTICE OF APPEARANCE AND REQUEST FOR
SERVICE OF ALL PLEADINGS AND DOCUMENTS**

PLEASE TAKE NOTICE that, pursuant to section 1109(b) of chapter 11 of title 11, United States Code (the “Bankruptcy Code”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Otto Candies, L.L.C.; Otto Candies, III; and Candies Shipbuilders, LLC (the “Parties-In-Interest”), by and through their undersigned counsel, hereby appear in the above-captioned chapter 11 cases of Deep Marine Holdings, Inc. and its affiliated debtors (the “Debtors”) and request, pursuant to Bankruptcy Rules 2002, 9007, and 9010 and section 342 of the Bankruptcy Code, that all papers, pleadings, motions, and applications served or required to be served in this case, be given to and served upon:

BALDWIN HASPEL BURKE & MAYER, L.L.C.
Energy Centre
1100 Poydras Street, Suite 2200
New Orleans, LA 70163-2200
Telephone: (504) 569-2900
Facsimile: (504) 569-2099
Attn: Karl J. Zimmermann
E-mail: karlz@bhblaw.com

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and the papers referred to in the Bankruptcy Rules and the Bankruptcy Code specified above, but also includes, without limitation, all orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by ordinary mail, hand delivery, telephone, facsimile, electronic mail, or otherwise, which may affect or seek to affect in any way any right or interests of the Parties-In-Interest with respect to the Debtors' estates, or any related entities, or property or proceeds thereof in which the Debtors' estates may claim an interest.

PLEASE TAKE FURTHER NOTICE that this appearance and request for service of all pleadings and documents is without prejudice to the Parties-In-Interest's rights, remedies, and claims against other entities or any objection that may be made to the subject matter jurisdiction of the Court and shall not be deemed or construed to submit the Parties-In-Interest to the jurisdiction of the Court. This appearance shall not be deemed or construed to be a waiver of the right of the Parties-In-Interest (i) to have final orders in non-core matters entered only after *de novo* review by a District Judge, (ii) to trial by jury in any proceeding so triable in this case or any case, (iii) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary

withdrawal, or (iv) to exercise any other rights, claims, actions, setoffs, or recoupments to which the Parties-In-Interest are or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments the Parties-In-Interest expressly reserve.

Dated: January 20, 2010

BALDWIN HASPEL BURKE & MAYER, LLC

/s/ Karl J. Zimmermann

Karl J. Zimmermann
LA Bar No. 14481
1100 Poydras Street, Suite 2200
New Orleans, LA 70163
Telephone: (504) 569-2900
Facsimile: (504) 569-2099
E-mail: karlz@bhbmlaw.com

COUNSEL FOR OTTO CANDIES, L.L.C.,
OTTO CANDIES, III, AND
CANDIES SHIPBUILDERS, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of January, 2010, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system. Notice of this filing will be sent to all counsel of record by operation of the Court's electronic filing system.

s/ Karl J. Zimmermann